ENVIRONMENTAL PROTECTION AGENCY NAVY -- SEMI-ANNUAL BRAC REPORT April 1, 2011 – September 30, 2011

NCBC DAVISVILLE, RI

EPA RPM: Christine Williams 617-918-1384 <u>williams.christine@epa.gov</u>
State RPM: Richard Gottlieb 401-222-2797 <u>richard.gottlieb@dem.ri.gov</u>
DoD BEC: David Barney 617-753-4656 <u>david.a.barney@navy.mil</u>

I. Significant Issues:

- a. Congressional: No congressional issues at this time.
- b. High Profile Items: None.
- c. Delays in Environmental Restoration Actions: None.
- II. <u>Issues Impacting Transfer:</u> Nike PR58 FUDS is one of the sources for OU 7, the Site O3 groundwater plume. As a follow-up to various technical meetings, the Army Corps of Engineers (ACOE) is investigating the area beyond where EPA's recently installed wells indicated the Nike plume was moving. The Nike Remedial Investigation (RI) has again been delayed due to additional ACOE contracting issues. The report is now expected to be completed late this fall. The Record of Decision (ROD) may be delayed beyond 2012 for the Nike site. This will likely delay the OU 7 ROD further in order to incorporate the ACOE/Rhode Island Department of Environmental Management decision into the ROD (currently expected in FY 2012).
- III. Staffing/Funding Issues: None.

IV. MOU Support Update:

EPA and Navy are cooperating in the remedy optimization investigation at OU 8. Navy and EPA have used information gleaned from Navy's and EPA's 2010/2011 field work to refine the locations of new monitoring wells to support the ongoing Long Term Monitoring (LTM) Optimization. EPA is also using Strategic Environmental Research and Development Program resources to determine contaminant flux at the source area and downgradient. Source area and downgradient flux meters were recently installed along newly established transects. Navy also recently completed a source removal action. We are awaiting the after action report.

SOUTH WEYMOUTH NAVAL AIR STATION, MA

EPA RPM:	Carol Keating	617-918-1393	<u>keating.carol@epa.gov</u>
	Kymberlee Keckler	617-918-1385	keckler.kymberlee@epa.gov
State RPM:	Dave Chaffin	617-348-4005	david.chaffin@state.ma.us
DoD BEC:	Dave Barney	617-753-4656	david.a.barney@navy.mil

I. Significant Issues:

- a. Congressional: The Navy and the developers of the former South Weymouth NAS recently agreed on a \$25 million purchase price for the remaining 834 acres of the Base (approx. 600 acres previously transferred). The developers remain concerned, however, about the level to which remaining contamination will be remediated. The Navy imposed a November 15, 2011 deadline for the developers to make that decision. With the entire financial deal hinging on remaining cleanup decisions, political interest, both at the local and national level, has continued to increase. EPA remains hopeful that the purchase agreement will ultimately move ahead. If it does not, it will not be as a result of EPA's lack of engagement, transparency or appropriately aggressive cleanup proposals.
- b. High Profile Items: See Section I(a) above.
- c. Delays in Environmental Restoration Activities: None.
- II. <u>Issues Impacting Transfer</u>: See I(a) above.
- III. Staffing/Funding Issues: None.

IV. MOU Support Update:

The United States Geological Survey, under an existing interagency agreement with EPA, is performing borehole geophysical logging of wells at Building 81 and the SRA site. The primary objective of the work is to provide information on patterns of bedrock groundwater flow from transmissive water bearing fractures based on advanced (high resolution) flowmeter logging of select wells. The information will be useful to refine our understanding of transport pathways in the bedrock, and specifically help delineate vertical distribution of contaminants in groundwater monitoring wells.

NAVAL ACTIVITY PUERTO RICO, PR

EPA RPM:	Timothy R. Gordon	212-637-4167	<u>gordon.timothy@epa.gov</u>
State RPM:	Wilmarie Riveria	767-787-8181x6129	wilmarivera@jca.pr.gov
DoD BEC:	Mark Davidson	843-743-2124	mark.e.davidson@navy.mil

I. Significant Issues:

- a. Congressional: No congressional issues at this time.
- b. High Profile Items: A Land Use Plan for the Naval Activity Puerto Rico (NAPR) site was approved by the Puerto Rico government through its Local Redevelopment Authority (LRA) in 2004. In April 2010, the LRA prepared an addendum to the Land

Use Plan, to reflect changes in the proposed future usage for approximately 1,300 acres of the facility's 8,400 acres, based on the new "Caribbean Riviera" development proposal of the Puerto Rico government. The "Caribbean Riviera" proposal envisions development of a major tourist complex, including a "mega-casino", hotel and cruise ship terminal at the former industrial areas of the NAPR facility. In May 2011, the Navy prepared a draft Supplemental Environmental Assessment (SEA) reflecting the April 2010 addendum to the Land Use Plan to allow the "Caribbean Riviera" development proposal. In September 2011, the Navy advised that it had reached an agreement in principal with the LRA to transfer through an "economic development conveyance" (EDC) approximately 1,330 acres including the former "Sale Parcel III and Science Park Parcels. The Navy further advised EPA that it expects to complete this EDC transfer by December 31, 2011. In September 2011, the Navy prepared a draft Finding of Suitability to Lease (FOSL) to the LRA for approximately 330 acres of the 1,330 acres of EDC lands needed for the "Caribbean Riviera" development proposal, while the Navy completes all remaining investigation and clean-up requirements for those 330 acres. On September 26, 2011, the Navy finalized the SEA and a Finding of No Significant Impact (FONSI), based on the April 2010 addendum to the Land Use Plan allowing the "Caribbean Riviera" development proposal.

- c. Delays in Environmental Restoration Actions: None.
- II. <u>Issues Impacting Transfer:</u> Completion of all required corrective action activities at 80 solid waste management units (SWMUs), and 6 Areas of Concern (AOCs) under a 2007 RCRA Section 7003 Consent Order between the Navy and EPA.
- **III.** Staffing/Funding Issues: None.
- IV. MOU Support Updates: EPA is the lead agency for oversight of the Navy's corrective action activities under the 2007 RCRA Section 7003 Consent Order. EPA also coordinates the oversight by the Commonwealth of Puerto Rico's Environmental Quality Board (PREQB) of the Navy's corrective action implementation under the 2007 RCRA Consent Order. EPA has streamlined the time and effort required for it and PREQB's review and approval of corrective action documents (work plans/reports, etc.), by instituting a process of first reviewing the Navy's "Working Draft" responses and revisions to address EPA and PREQB comments, prior to the documents being finalized and officially submitted by the Navy.

NAS CECIL FIELD, FL

EPA RPM: Debbie Vaughn-Wright 404-562-8539 <u>vaughn-wright.debbie@epa.gov</u>
State RPM: David Grabka 850-245-9887 <u>David.Grabka@fdep.fl.state</u>
DoD BEC: Art Sanford 843-743-2135 <u>sanford.art.ctr@navy.mil</u>

I. Significant Issues:

a. Congressional: No congressional issues at this time.

- b. High Profile Items: Third Five Year Review completed. Review identified several follow-up actions were needed.
- c. Delays in Environmental Restoration Activities: None.

II. Issues Impacting Transfer:

Site 15, OU 5 (Blue 10 Ordnance Disposal Area) is the last parcel to be transferred. Ongoing military munitions response is the only hindrance to property transfer. Site 15 is 85 acres and was a former skeet and trap range, as well as ordnance disposal area.

III. Staffing/Funding Issues: None.

IV. MOU Support Update:

Over 200 parcels of land were investigated under the BRAC Program. Environmental investigations and remediation have been completed at all BRAC sites identified. EPA has contributed RPM, attorney, and EPA technical services support to the project over the last few years. EPA support has exceeded 0.5 FTE per year. Future support will not be requested. Management and oversight for maintenance and optimization of the Superfund Remedial Actions will be addressed by the Superfund program

HUNTERS POINT NAVAL SHIPYARD, CA

EPA RPM:	Craig Cooper	415-947-4148	ccooper@epa.gov
State RPM:	Ryan Miya	510-540-3775	rmiya@dtsc.ca.gov
DoD BEC:	Keith Forman	619-532-0913	keith.s.forman@navy.mil

I. Significant Issues:

- a. Congressional: No congressional issues at this time.
- b. High Profile Items: EPA is still in the process of negotiating the Administrative Order on Consent with the city/developer which will essentially replace the Federal Facility Agreement (FFA) for the early transfer parcels.

The Navy issued the proposed plan for the landfill parcel. The community has historically been opposed to closure-in-place. EPA and the Navy have done many outreach meetings leading up to the proposed plan public meeting to talk about what the different remedial options entail, including full excavation, partial excavation and containment. The community members at the public meeting were receptive to the proposed remedy of partial excavation with containment for most of the waste. One non-profit group requested, and was granted, a 30-day extension to the public comment period. We expect comments from them opposing the proposed remedy.

c. Delays in Environmental Restoration Actions: None.

II. <u>Issues Impacting Transfer</u>:

The city's negotiations with potential insurance carriers to support the early transfer continue to be slower than expected. This may delay the early transfer date by several months.

III. <u>Staffing/Funding Issues</u>: Craig Cooper is the new project manager, and Melinda Garvey will be assisting him on various projects.

IV. MOU Support Update:

EPA has initiated meetings with the California State Parks, Bay Conservation Development Commission and the Navy to better coordinate the state's work on wetlands along Yosemite Slough, immediately adjacent to the Navy's proposed wetlands at the landfill parcel. Timing and coordination are crucial, because the state and Navy work will impact one another. EPA is also beginning to coordinate with the Navy on EPA's enforcement work with the potentially responsible parties for PCB contamination within Yosemite Slough.

LONG BEACH SHIPYARD, CA

EPA RPM: Martin Hausladen 415-972-3007 <u>hausladen.martin@epa.gov</u>

 State RPM:
 Alan Hsu
 714-484-5395
 <u>AHsu@dtsc.ca.gov</u>

 DoD BEC:
 John Hill
 619-532-0985
 <u>john.m.hill.@navy.mil</u>

I. Significant Issues:

a. Congressional: No congressional issues at this time.

b. High-Profile Items: Dredging at Site 7 Basin is completed.

c. Delays in Environmental Restoration Actions: None.

II. Issues Impacting Transfer: None.

III. Staffing/Funding Issues: None.

IV. MOU Support Update:

EPA continues to review all documents from the site. EPA also continues to provide information about the history of site remediation and agreements between regulators and Navy. The RPM also provides guidance on requirements under CERCLA.

TUSTIN MARINE CORPS AIR STATION, CA

EPA RPM: James Ricks 415-972-3023 ricks.james@epa.gov State RPM: Anantararmam (Ram) Peddada 714-484-7418 apeddada@dtsc.ca.gov

John Broderick 951-782-4493 broderick@waterboards.ca.gov

DoD BEC: James Callian 619-532-0952 james.callian@navy.mil

I. Significant Issues:

a. Congressional: No congressional issues at this time.

- b. High Profile Items: None.
- c. Delays in Environmental Restoration Actions: None.
- **II. Issues Impacting Transfer**: None.
- III. <u>Staffing/Funding Issues</u>: None.

IV. MOU Support Update:

OU 1A/OU 1B Annual Performance Evaluation Groundwater Remedy Report -- EPA has completed the review of the Navy report that evaluates the performance of the remedies (hydraulic containment via groundwater extraction wells and treatment system) implemented for OU 1A (IRP-13S) and OU 1B (IRP-3 and IRP-12). EPA concurs with the findings that the plumes for OU 1A and OU 1B are hydraulically contained through 2010, which demonstrates that the treated effluent is within the discharge limits established by the Orange County Sanitation District. As part of the Navy's ongoing evaluation of remedy performance, system optimization and quarterly monitoring are continuing. The results for 2011 will be reported in the next Annual Performance Evaluation Report - Groundwater Remedy at OU 1A and OU 1B (scheduled to be issued third quarter FY 2012).

<u>UST 222 Final PCAP Closeout Report</u> -- Based upon EPA's review of the quarterly data summary reports (e.g., extraction rates and treated groundwater volumes and mass removal of MTBE), evaluation of optimization measures and the Navy's response to regulatory comments, EPA concurs with the report's recommendation that the PCAP system should be shut down and that the Navy should prepare a closeout strategy

<u>Draft Remedial Design and Remedial Action (RD/RA)Work Plan and Long-Term Operation and Maintenance Report OU 4B</u> -- EPA is completing the review of the Navy report that discusses the areas within OU 4B (IRP Sites 11 and 13W) that will require Institutional Controls to prevent exposure to contaminated groundwater and to maintain the integrity of the remedy components consistent with final OU 4B ROD. This would include short-term and long-term actions such as annual groundwater monitoring, site inspections, and reporting. The sites will have a Five-Year Review to ensure that the remedy is protective of human health and the environment.

Draft OU 1A/OU 1B CERCLA Five Year Review Report for IRP Sites 1,3, 12 -- EPA and Regional Water Quality Control Board (RWQCB) have completed the technical assessment of the subject draft final Five-Year Review Report. The RWQCB has formally provided concurrence with the Navy's protectiveness declaration (August 17, 2011). EPA is prepared to similarly concur. However, in response to a request from the Department of Toxic Substances Control (DTSC), EPA has agreed to defer sending formal concurrence pending the completion of the state's review and technical discussions

with the Navy. MCAS Tustin is a Non-NPL closing federal facility and, per EPA's 2001 comprehensive Five-Year Review guidance, DTSC is the lead regulatory agency for the subject report. Under CERCLA, the Navy's statutory deadline for completing the Five-Year Review was October 31, 2011.

Consequently, it is critically important that all technical review comments be submitted to the Navy in a timely manner that allows for adequate review and resolution of any outstanding issues *prior to* the statutory deadline.

TREASURE ISLAND NAVAL STATION, CA

EPA RPM:	Melinda Garvey	415-947-4184	garvey.melinda@epa.gov
State RPM:	Remedios Sunga	510-540-3840	rsunga@dtsc.ca.gov
	Ross Steenson	510-622-2445	rsteenson@waterboards.ca.gov
	Myriam Zech	510-622-5684	mzech@waterboards.ca.gov
DoD BEC:	James Sullivan	619-532-0966	james.b.sullivan2@navy.mil

I. Significant Issues:

- a. Congressional: No congressional issues at this time.
- b. High Profile Items: None.
- c. Delays in Environmental Restoration Actions: The Navy will prioritize cleanup to facilitate transfer of some parcels.
- **II. Issues Impacting Transfer:** None.
- III. Staffing/Funding Issues: None.

IV. MOU Support Updates:

The EPA RPM participates in BRAC Cleanup Team (BCT) meetings and reviews documents, as provided. EPA has been involved in site radiological cleanup discussions with the Navy, DTSC and California Department of Public Health. EPA is contributing to the Site 12 Remedial Investigation Report BCT discussions, review and comments. EPA continues to support the Navy's effort to clean up and transfer the property.

MCAS EL TORO, CA

EPA RPM:	Mary T. Aycock:	415-972-3289	<u>aycock.mary@epa.gov</u>
State RPM:	Quang Than:	714-484 -5352	QThan@dtsc.ca.gov
DoD BEC:	James Callian:	619-532-0952	james.callian@navy.mil

I. Significant Issues:

- a. Congressional: No congressional issues at this time.
- b. High Profile Items: None.

- c. Delays in Environmental Restoration Actions: Site 16 Remedy Performance -- The Five-Year Review issued in October of 2009 indicates that primary mechanisms occurring at the site to attenuate TCE in groundwater are "physical processes including advection, diffusion and dispersion," and that "VOC concentrations recently reported for 2008 indicate that the TCE to the west and northwest of the groundwater plume appears to be spreading laterally, and this observation needs to be confirmed" (Sec.6.4.2.2, p. 6-4). The document does not present a convincing argument that the Monitored Natural Attenuation remedy is on target to meet Remedial Action Objectives (RAOs) by natural attenuation in the anticipated 19-year remedy performance period. This is a remedy performance issue that is appropriately identified in the Five-Year Review. However, we agree that it is too early in remedy implementation to identify it as a protectiveness issue. Consequently, we agree that the remedy performance is best tracked through ongoing site oversight at this time.
- II. <u>Issues Impacting Transfer:</u> See section I(c) above.
- III. Staffing/Funding Issues: None.

IV. MOU Support Update:

Finding of Suitability to Transfer #7 for Carve-Outs -- EPA reviewed the Finding of Suitability to Transfer (FOST) 7 document which includes various carve-outs (IIQ, IIF, and IID). The purpose of the FOST is to summarize how the requirements and notifications for hazardous substances, petroleum products, and other regulated material within Carve-Outs (COs) at former MCAS El Toro have been satisfied by the Department of the Navy. Through the BRAC process, the Navy transferred, by deed(s), certain former MCAS El Toro real property in 2004. Other real property known as COs were retained by the Navy, pending further investigation and cleanup to support determinations that the property is environmentally suitable for transfer. The FOST is scheduled to be finalized in December of 2011.

Explanation of Significant Difference (ESD) for IRP Sites 2 AND 17 -- The Navy issued this document for EPA's final review on March 3, 2011. EPA signed the ESD in April 2011. This ESD for IRP Sites 2 and 17 at former MCAS El Toro, documents changes to the widths of the buffer zones which are a component of the areas requiring institutional controls surrounding the landfills as described in the April 2000 final Interim ROD for IRP Sites 2 and 17. The final Interim ROD prohibits construction of structures within 1,000 feet of the edges of the landfills without prior approval of the Navy and the FFA signatories.

IRP Site 1 Former Explosive Ordnance Disposal Training Range -- IRP Sites 1 and 2 Groundwater -The Final Feasibility Study, the final Pilot Study Technical Memorandum, and the final proposed plan were issued by April 2011. All documents received agency concurrence. The Navy expressed great appreciation to all agency reviewers for the excellent teamwork and on-time completion of these critical documents. The public comment period for the preferred remedial alternative was from April 20 - May 20, 2011, and the public meeting was held on April 27, 2011.

Other -- EPA has provided support to the Navy in the following activities which has helped to expedite cleanup and transfer of the site:

- Regulatory support and clarification regarding CERCLA issues during the quarterly BCT meetings conducted with regulators and stakeholders.
- Assistance with community involvement coordination for quarterly RAB meetings to demonstrate support for the Navy's ongoing restoration program at El Toro and encouraged public participation. EPA is also currently participating in the revision of the Community Action Plan for the site, including conducting joint interviews with the stakeholders.
- Assistance with Navy and DTSC negotiations involving decisions regarding Remedial Actions.
- Technical support through EPA's ADA Office to provide a modeler to review and test the IRWD Model for remediation of TCE at the site. This helps the Navy and IRWD comply with the existing ESD for groundwater remediation.
- Support for the Navy's restoration team by participating in FOST 7 meetings on site and recommending approval to DTSC and the Orange County RWQCB, thus expediting the transfer of the property.

ALAMEDA NAVAL AIR STATION, CA

EPA RPM:	Xuan-Mai Tran	415-972-3002	<u>Tran.Xuan-Mai@epa.gov</u>
	Pankaj Arora	415-972-3040	arora.pankaj@epa.gov
State RPM:	James Fyfe	510-540-3850	jfyfe@dtsc.ca.gov
DoD BEC:	Derek Robinson	619-532-0951	derek.j.robinson1@navy.mil

I. Significant Issues:

- a. Congressional: No congressional issues at this time.
- b. High Profile Items: The Alameda BCT worked diligently to complete the Five-Year Review for Alameda Point, and Fleet and Industrial Supply Center Oakland, Alameda Facility/Alameda Annex. This was an extremely large, comprehensive document that represented a significant effort by all parties.
- c. Delays in Environmental Restoration Actions: None.
- II. Issues Impacting Transfer: None.
- III. Staffing/Funding Issues: None.

IV. MOU Support Updates:

<u>Five-Year Review</u>: EPA assisted the Alameda Navy team in completing the Five-Year Review for Alameda Point, and Fleet and Industrial Supply Center Oakland, Alameda Facility/Alameda Annex. The Five-Year Review determined that the remedies for soil and groundwater remain protective of human health and the environment in the short term. Long-term protectiveness will be addressed through a series of additional evaluations. The Five-Year Review also identified issues and made recommendations with expected completion dates.

OU 2A: EPA worked with the Alameda BCT to finalize the Feasibility Study (FS) for OU 2A in June 2011, and the proposed plan for OU 2A in August 2011. A public meeting on OU 2A proposed plan took place in August 2011.

<u>OU 2B</u>: EPA has been working with the Alameda BCT on the OU 2B FS. The hexavalent chromium COC remedial goal issue and alternatives will be addressed in subsequent addendum report(s) to allow the OU 2B FS report to move forward as scheduled.

<u>OU 2C</u>: EPA worked with the Alameda BCT to finalize the FS for OU 2C in May 2011. EPA is currently working with the Alameda BCT on OU 2C FS addendum to address the known or potentially radiologically-impacted drain lines/piping and surrounding soil outside of Buildings 5 and 400.

<u>Site 1</u>: EPA assisted the Alameda Navy team in developing a Focused Feasibility Study outline and a schedule for the ROD amendment for IR Site 1. A ROD amendment is in process and is planned to be completed in 2012, addressing the new findings during the pre-design characterization. EPA worked with the Alameda BCT on the RD/RA Workplan for IR Site 1 groundwater, which had a scheduled completion date of October 2011.

<u>Site 2</u>: EPA commented on the Intermediate draft RD for IR Site 2. This RD is scheduled to be completed in January 2012.

Site 17: EPA worked with the Alameda BCT in identifying the additional areas to be dredged to address the contaminated sediment in the Debris Piles areas. This effort is considered to be part of the Time Critical Removal Action of the Debris Piles at the Seaplane Lagoon, saving the Navy time in cleanup and dollars in remedial process evaluation. The dredging activity for the contaminated sediment in the Debris Piles areas was completed in May 2011. The dredging activity at the northeast corner of Seaplane Lagoon was also completed in May 2011. The contaminated sediment dredged from the northeast corner of Seaplane Lagoon is being processed for dewatering and disposal.

<u>Site 24</u>: EPA commented on the draft RD/RA Workplan for IR Site 24. This document is expected to be finalized in December 2011.

Site 34: EPA worked with the Alameda BCT to finalize the ROD for IR Site 34 in April 2011.

OU 5/IR Site 02 Groundwater: EPA is currently reviewing the OU 5/IR 02 Interim Remedial Action Completion Report submitted by the Navy.

MARE ISLAND, CA

EPA RPM: Carolyn d'Almeida 415-972-3150 <u>dalmeida.carolyn@epa.gov</u>

State RPM: Janet Naito 510-540-3833 <u>jnaito@dtsc.ca.gov</u>
DOD BEC: Janet Lear 619-532-0976 Janet.Lear@Navy.mil

I. Significant Issues:

a. Congressional: No congressional issues at this time.

b. High-Profile Items: None.

c. Delays in Environmental Restoration Actions: None.

II. Issues Impacting Transfer: None.

III. Staffing/Funding Issues: None.

IV. MOU Support Updates:

EPA continues to review and approve PCB site closures under TSCA. During this reporting period, final closure was granted to Navy-retained PCB sites at buildings 163 in Investigation Area C1, and 832 in Investigation Area C3, as well as Buildings 900 and 1300 in Investigation Area F2. We also recertified the cleanup of the Island Energy PCB spill outside Building 641 in Investigation Area A2. In the Eastern Early Transfer Parcel, TSCA No Further Action determinations were granted at PCB sites Building 541 AL#01, Building 678 AL#04, Building 121 UL#01, UL#02, AL #01, AL#02 and AL#03, and Building 1342 UL#01, although deed restrictions still need to be recorded at these sites. EPA also certified the recordation of land use covenants for PCB sites 108A AL#01, Berth 16 AL#01, Building 334 AL#02, Building 840 UL#01, and Building728 UL#02. Cleanup proposals (TSCA 761.61(a) notifications) were also approved for Sites Building 1304 UL#01, Building 68 UL#02 and UL#03 and Building 854 UL #01, all in the Eastern Early Transfer Parcel.

ADAK NAVAL AIR STATION, AK

EPA RPM:	Christopher Cora	206-553-1478	cora.christopher@epa.gov
State RPM:	Guy Warren	907-269-7528	guy.warren1@alaska.gov
DoD BEC:	Dina Ginn	360-396-0016	dina.ginn@navy.mil

I. Significant Issues:

a. Congressional: No congressional issues at this time.

b. High Profile Items:

- Reviewed Draft FS for OU B-2. This is the 4th attempt by the Navy to submit a FS that complies with EPA guidance and presents remedial alternatives in a manner which can be evaluated in relation to the OU B-2 Sites.
- Reviewed the third Five Year Review for all OU's on Adak.
- No action by the Navy to address comments submitted on the OU B-1 After Action Reports.
- Navy replaced the previous OU B-2 Project Manager in an attempt to address issues on resolving OU B-2 FS problems.
- c. Delays in Environmental Restoration Activities: OU B-2 Remedy Implementation needs to move forward, or future lack of funding may delay transfer.

II. <u>Issues Impacting Transfer:</u>

OU B-2 Remedy implementation remains to be completed prior to "transfer" of remaining property. It should be noted that the remaining acreage will revert to U.S. Fish and Wildlife Service as part of the Aleutian Islands Maritime Reserve.

III. Staffing/Funding Issues:

Navy has notified EPA that they plan on conducting a Non-Time Critical Removal Action at OU B-2 (Parcel 4). This will require a modification to EPA's technical support contract to review and provide technical support for the Non-Time Critical Removal Action. Navy replaced their project manager for OU B-2.

IV. MOU Support Update:

EPA provided comments on draft FS for OU B-2 and the third Five Year Review.